

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**JAMES MICHAEL AMOR  
PATRICIA ELVIRA AMOR,**  
213 N. Kinzer Ave.  
New Holland, PA 17557

*Plaintiffs,*

**vs.**

**COURTNEY CONOVER**  
6522 Mason Cir  
Randleman, NC 27317

*Defendant.*

NO. 21-5574

CIVIL ACTION

JURY TRIAL DEMANDED

**MOTION FOR PRELIMINARY INJUNCTIVE RELIEF**

By and through his undersigned counsel, the Plaintiffs hereby move the Court for preliminary injunctive relief against the Defendant for the reasons set forth in the attached Memorandum of Law.

1. The Plaintiff, JAMES MICHAEL AMOR, is a Doctor of medical Dentistry with a business practice located at 566 E. Main Street, New Holland, PA 17557.

2. The co- Plaintiff, PATRICIA ELVIRA AMOR, is the wife of JAMES MICHAEL AMOR. For the

3. The Defendant, COURTNEY CONOVER, is an adult individual with an address located at .

4. Dr. Amor provides professional dental services to the public.

5. Dr. Amor was also employed as the Performance Entertainment Director of the Pittsburgh Renaissance Faire (Faire ) in the Summers of 2020 and 2021.

6. Dr. Amor expects to be employed as the Performance Director of the Pittsburgh Renaissance Faire (Faire ) in the Summers of 2022.

7. He has had this position since 2009.

8. Dr. Amor expects to be employed as the Director of other Faires around the United States.

9. The Defendant was a paying guest in 2020 and 2021.

10. Starting in April 2021 and continuing periodically throughout the year, the Defendant has posted false and defamatory allegations accusing the Plaintiff and his wife of aiding and abetting pedophiles and/or rapists by refusing to take the claims of rape and sexual assault victims seriously and by retaliating against them.

11. Defendant's accusations include but are not limited to allegations that the Plaintiffs retaliated against said rape and/or sexual assault victims by, amongst other things, publicly humiliating them, calling them crazy, refusing to rehire them, and/or terminating them from employment.

12. The Defendant's allegations against the Plaintiffs are false. The false claims contained in Exhibits 1-3, attached hereto and incorporated herein.

13. The defamatory statements described above were published on the Internet, communicated to third parties, and accessible to individuals worldwide via the Internet.

14. Because of his dentistry practice and his position as Performance Director at the Pittsburgh Renaissance Faire and other such 'Faires,' Dr. Amor has a high profile on numerous Internet sites.

15. The Defendant has published these false statements on the Internet to be read by Dr. Amor's former and prospective patients and the employees and directors of Renaissance Faires around the United States.

16. Defendant's allegations, which masquerade and are warranted as accurate, are false, damaging, and highly offensive to the Plaintiffs.

17. The Plaintiffs conducted themselves ethically and in no way committed the acts alleged by Defendant.

18. Upon information and belief, as a direct and proximate result of the publications, Defendant's defamatory statements have been repeated on other websites.

19. Defendant deliberately, recklessly, and maliciously published and republished the preceding false and defamatory information.

20. The actions by Defendant entailed communications that were defamatory and continue on her blog and Facebook to this day.

21. The foregoing actions by Defendant entailed communications that resulted in special harm to the Plaintiffs.

22. The foregoing actions by Defendant were an abuse of any conditional privilege that may have applied (the existence of any such privilege being expressly denied).

23. The statements published by Defendant as aforesaid were false.

24. When the foregoing false statements were published, Defendant knew or should have known that the statements were false.

25. Defendant published the foregoing false statements of and regarding the Plaintiffs either intentionally or maliciously, with reckless disregard for their truth or falsity, or negligently and carelessly.

26. As a direct and proximate result of Defendant's false publications as aforesaid, the Plaintiffs have been and concurrently are significantly injured in their good name and reputations.

27. The Plaintiffs have been brought into scandal and reproach because of the printing, publication, and circulation (both past and ongoing) of the foregoing false statements.

28. The Plaintiffs have been held up to ridicule, scorn and, contempt among neighbors, business acquaintances, and other members of the public because of the printing, publication circulation open and with parts and ongoing) foregoing false statements.

29. As a direct and proximate result of Defendant's conduct, the Plaintiffs' reputations were damaged and their ability to engage in future business dealings, both in terms of Dr. Amor's dental practice and his position as Director of numerous Faires.

30. As a result of the conduct of Defendant, the Plaintiffs have sustained significant financial harm, pain and suffering, and severe emotional distress.

31. In publishing the aforesaid defamatory statements, Defendant continues to cause Plaintiffs significant financial harm, including damage to Plaintiff Amor's reputation amongst his current and prospective patients and clients.

32. The Plaintiffs have been damaged by and continue to be irreparably damaged by the conduct of Defendant.

33. Damages alone are insufficient to remedy the conduct described above.

34. The Damages continue absent equitable relief.

35. If Defendant is permitted to continue her wrongful conduct as aforesaid, the Plaintiffs will suffer irreparable harm as follows:

- a. Plaintiff Amor will lose and continue to lose a substantial number of current and prospective patients; and
- b. Plaintiff Amor more will suffer and continue to suffer a substantial loss of business and profits now and in the future.
- c. Plaintiff Amor will be terminated in his positions of Director for numerous Faires, resulting in a loss of income and irreparable harm to his and his wife's reputation.

WHEREFORE, for the foregoing reasons, the Plaintiffs request that the Court enter the attached Order granting injunctive relief against the Defendant granting all such relief as the Court deems necessary in this matter.

Respectfully submitted,

KOLMAN LAW P.C.

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December 30, 2021